

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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ROBERT SCALLI,
Plaintiff,

v.

U.S. DISTRICT COURT
DISTRICT OF MASS.
CIVIL ACTION NO.: 03CV-12414NG

CITIZENS FINANCIAL GROUP, INC.
Defendant.

PLAINTIFF, ROBERT SCALLI'S MOTION TO AMEND COMPLAINT

Now comes the Plaintiff, Robert Scalli, moves pursuant to Fed. R. Civ. P. 15(a), that this Honorable Court grant his Motion to Amend the Complaint on November 7, 2003. As grounds for the Plaintiff's Motion to Amend Complaint the Plaintiff states as follows:

1. A decision to grant a motion to amend complaint is freely permitted when justice so requires and remains in the broad discretion of the trial judge. See Tele-Connections, Inc. v. Perception Technology Corp., No. 88-2365-S, 1990 U.S. Dist. Lexis 15507, November 5, 1990 (holding that amendment of pleadings under Rule 15(a) is freely granted). See also, Murphy v. I.S.K. Con. of New England, Inc., 409 Mass. 842, certiorari denied, 112 S. Ct. 191 (1991).

WHEREFORE, the Plaintiff, Robert Scalli, respectfully requests that this Honorable Court grant his Motion to Amend Complaint.

The proposed Amended Complaint is submitted herewith.

Respectfully submitted,
The Plaintiff, Robert Scalli,
By his attorney,



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Dated: 1/8/04